

July 21, 2005

**Via ECFS**

Marlene H. Dortch, Secretary  
445 Twelfth Street, SW  
Washington, DC 20554

Re: *Notice of Ex Parte Presentation (CC Docket No. 96-45)*

Dear Ms. Dortch:

On July 20, 2004, Frontier Communications and Citizens Communications (“Frontier”), on behalf of the Frontier and Citizens incumbent local exchange carriers (“ILECs”) seeking waiver of section 54.802(c) and review of a decision of the Universal Service Administrative Company,<sup>1</sup> had two ex parte meetings with FCC staff regarding the petition. One meeting was with Anthony Dale of the Office of Chairman Martin. The other meeting was with Thomas Navin, Chief, Wireline Competition Bureau; Jeremy Marcus, Legal Counsel; Narda Jones, Chief, Telecommunications Access Policy Division (“TAPD”); and Gina Spade, Assistant Chief, TAPD. Frontier was represented at the meeting by Jerry Elliott, Executive Vice President and Chief Financial Officer; Alex Harris, Vice President for Federal Government Relations; Kevin Saville, Associate General Counsel; Kenneth Mason, Director of Federal Government Affairs; and the undersigned.

---

<sup>1</sup> Citizens Communications and Frontier Communications Request for Review of a Decision of the Universal Service Administrator and Petition for Waiver of FCC Rule Section 54.802(a), CC Docket No. 96-45 (filed July 8, 2005).

WILKINSON ) BARKER ) KNAUER ) LLP

Marlene H. Dortch, Secretary

July 21, 2005

Page 2

In the meeting, Frontier discussed the key points made in the petition. In particular, Frontier explained how its failure to meet the deadline by two business days was due to special circumstances, and that considerations of hardship and equity militate strongly in favor of a waiver. In addition, Frontier requested that the Commission act on the petition expeditiously.

Sincerely,

WILKINSON BARKER KNAUER, LLP

By:                     /s/                      
L. Charles Keller

cc (by email): Anthony Dale  
Thomas Navin  
Jeremy Marcus  
Narda Jones  
Gina Spade